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9 Attorneys for Defendant
10 Hartford Life and Accident Insurance Company

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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 ALEXANDER PAMINTUAN,
16
17 Plaintiff,

18 v.

19 HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY, as Claims
20 Administrator of the Life Care Centers of
America, Inc. Welfare Benefits Plan; DOES I
21 thru V inclusive,
22 Defendants.

Case No. 2:21-cv-01365-RFB-NJK

**STIPULATION, REQUEST AND ORDER
EXTENDING TIME TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[First Request]

23
24 The parties, Plaintiff Alexander Pamintuan ("Plaintiff"), through his counsel, Julie A.
25 Mersch of the Law Office of Julie A. Mersch, and Defendant Hartford Life and Accident
26 Insurance Company ("Hartford"), through its counsel, Michael R. Brooks of Hutchison & Steffen
27 PLLC and Michael B. Bernacchi of Burke, Williams & Sorensen, LLP, hereby respectfully
28

1 submit this Stipulation, Request and Order to Extend Time to Answer or Otherwise Respond to
 2 Plaintiff's Complaint (the "Stipulation"). This Stipulation is made in accordance with Local
 3 Rules IA 6-1, IA 6-2, and II 7-1. This is the first request for an extension of time to file an
 4 answer or otherwise respond to Plaintiff's Complaint.

5 Hartford was served with Plaintiff's Complaint on August 9, 2021, making its current
 6 responsive pleading due on or before August 30, 2021. The instant extension is requested as
 7 Hartford's counsel requires additional time to review their client's file in order to prepare a
 8 meaningful responsive pleading to Plaintiff's Complaint and Hartford's lead counsel is also in the
 9 process of petitioning the Court for permission to practice in this particular case. He has initiated
 10 his petition for permission to practice in compliance with Local Rule IA 11-2 and anticipates
 11 completion within 14 days.

12 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
 13 respectfully requests this Court grant an extension of time, up to and including **September 29,**
 14 **2021**, for Hartford to file an answer or otherwise respond to Plaintiff's Complaint. By entering
 15 into this Stipulation, none of the parties waive any rights they have under statute, law or rule with
 16 respect to Plaintiff's Complaint.

17 DATED this 24th day of August, 2021.

DATED this 25th day of August, 2021.

18 LAW OFFICE OF JULIE A. MERSCH

HUTCHISON & STEFFEN, PLLC

19 By: /s/ Julie A. Mersch

By: /s/ Michael R. Brooks

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 22 Las Vegas, NV 89101

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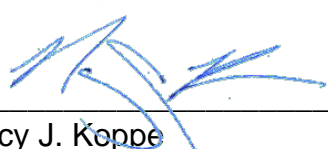
23 Attorney for Plaintiff
 24 Alexander Pamintuan

Michael B. Bernacchi
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 Los Angeles, CA 90071-2953

25 IT IS SO ORDERED.

Dated: August 26, 2021

Attorneys for Defendant
 Hartford Life And Accident Insurance
 Company

26 
 27 Nancy J. Koppe

28 United States Magistrate Judge